

EXHIBIT “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL HARRIS, Individually and as
the Administrator of the ESTATE of
QUINCY DAY-HARRIS
46 Anderson Court
Bear, DE 19701

Plaintiff

Docket No.:

v.

CITY OF PHILADELPHIA
1515 Arch Street
Philadelphia, PA 19102

JURY TRIAL DEMANDED

and

PRISON COMMISSIONER BLANCHE
CARNEY
Philadelphia Department of Prisons
7901 State Road
Philadelphia, PA 19136

and

WARDEN MICHELE FARRELL
Curran-Fromhold Correctional Facility
7901 State Road
Philadelphia, PA 19136

and

SERGEANT JEFFREY BISHOP
Curran-Fromhold Correctional Facility
7901 State Road
Philadelphia, PA 19136

and

CORRECTIONAL OFFICER JORDAN
HARRIS
Curran-Fromhold Correctional Facility
7901 State Road
Philadelphia, PA 19136

and :

CORRECTIONAL OFFICER ANDREW MENDES :

Curran-Fromhold Correctional Facility :

7901 State Road :

Philadelphia, PA 19136 :

and :

CORRECTIONAL OFFICERS JOHN/JANE DOES (1-10) (Fictitious) :

Curran-Fromhold Correctional Facility :

7901 State Road :

Philadelphia, PA 19136 :

and :

CENTURION HEALTH :

21251 Ridgetop Circle :

Sterling, VA 20166 :

and :

MHM SERVICES, INC. :

1593 Spring Hill Rd., Suite 600 :

Vienna, VA 22182 :

and :

AMY FISHER, LSW :

Centurion Health :

21251 Ridgetop Circle :

Sterling, VA 20166 :

and :

KYERSTYN O'HARA, SW :

Centurion Health :

21251 Ridgetop Circle :

Sterling, VA 20166 :

and :

JILL REGALBUTO, LSW	:
a/k/a Jill Harris	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
and	:
	:
MEDICAL PROVIDERS JOHN/JANE	:
DOES (1-10) (fictitious)	:
Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
	:

Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, CENTURION HEALTH**

I, Todd A. Schoenhaus, Esquire, certify that:

 X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 X the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

___expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
TODD A. SCHOENHAUS, ESQUIRE
1634 Spruce Street
Philadelphia, PA 19103
(215) 546-6636
(215) 546-3641 fax
Attorneys for Plaintiff

Dated: August 21, 2023

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Centurion Health	:
21251 Ridgetop Circle	:
Sterling, VA 20166	:
	:
	:
Defendants	:

**CERTIFICATE OF MERIT AS TO
DEFENDANT, MHM SERVICES, INC.**

I, Todd A. Schoenhaus, Esquire, certify that:

 X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 X the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

___expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
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Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, AMY FISHER, LSW**

I, Todd A. Schoenhaus, Esquire, certify that:

 X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

___expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

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Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, KYERSTYN O'HARA, SW**

I, Todd A. Schoenhaus, Esquire, certify that:

 X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

____expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
NANCY J. WINKLER, ESQUIRE
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JILL REGALBUTO, LSW :
a/k/a Jill Harris :
Centurion Health :
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and :
:
MEDICAL PROVIDERS JOHN/JANE :
DOES (1-10) (fictitious) :
Centurion Health :
21251 Ridgetop Circle :
Sterling, VA 20166 :
:
Defendants

**CERTIFICATE OF MERIT AS TO
DEFENDANT, JILL REGALBUTO, LSW A/K/A JILL HARRIS**

I, Todd A. Schoenhaus, Esquire, certify that:

 X an appropriate licensed professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by this Defendant in the treatment, practice or work that is the subject matter of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

AND/OR

 the claim that this Defendant deviated from an acceptable professional standard is based solely on allegations that other licensed professionals for whom this Defendant is responsible deviated from an acceptable professional standards and an appropriate license professional(s) has supplied a written statement(s) to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by the other licensed professionals in the

treatment, practice or work that is the subject of the Complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm;

OR

___expert testimony of an appropriate licensed professional is unnecessary for prosecution of the claim against this Defendant.

**EISENBERG, ROTHWEILER,
WINKLER, EISENBERG & JECK, PC**

By: s/Todd A. Schoenhaus
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TODD A. SCHOENHAUS, ESQUIRE
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Attorneys for Plaintiff

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